1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 ABIN'BOLA NELLAMS. 9 No. 2:17-cy-00911-RSM Plaintiff. 10 STIPULATED MOTION FOR 14-DAY CONTINUANCE OF DEADLINE FOR VS. 11 FILING MOTIONS RELATED TO DISCOVERY AND ORDER PACIFIC MARITIME ASSOCIATION, a 12 California non-profit corporation; SSA MARINE, INC., a Washington 13 corporation; TOTAL TERMINALS INTERNATIONAL, LLC, a Delaware 14 limited liability company; INTERNATIONAL LONGSHOREMEN'S 15 & WARE-HOUSEMEN'S UNION, LOCAL 19, a Washington non-profit 16 corporation; FARON FLETCHER, individually and in his official capacity as 17 terminal supervisor for SSA Marine, Inc., 18 Defendants. 19 STIPULATED MOTION 20 It is stipulated by the parties that the deadline for filing motions related to discovery should 21 be extended for 14 days, from July 13, 2018 to a new deadline of July 27, 2018. The trial date and 22 discovery cutoff will not be affected by granting this motion, which is brought to allow sufficient 23 time for the defendants to complete production of the extensive documentation in their possession 24 and the plaintiff to review that production before the deadline for filing discovery motions. 25 26

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| 1 | DATED this 12 th day of July, 2018. | |
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| 3 4 5 6 7 8 9 | By: s/Stephanie Stocker Stephanie Stocker, WSBA No. 33567 HENDERSON LAW GORUP, PLLC PO Box 11069 Olympia, WA 98508 Tel: (360) 943-7710 Email: Stephanie@hendersonlaw.net By: s/Clemens H. Barnes Clemens H. Barnes Clemens H. Barnes Kellen Andrew Hade, WSBA No. 44535 Alyson L. Palmer, WSBA No. 46916 MILLER NASH GRAHAM & DUNN LLP Pier 70, 2801 Alaskan Way Ste 300 Seattle, WA 98121-1128 Tel: (206) 624-8300 Fax: (206) 340-9599 Email: clem.barnes@millernash.com Email: kellen.hade@millernash.com Email: alyson.palmer@millernash.com Email: alyson.palmer@millernash.com Attorneys for Defendants Pacific Maritime | |
| 10 | Email: mike@rjh-legal.com Association and SSA Marine, Inc. | |
| 11 | Attorneys for Plaintiff | |
| 12 13 | ODDED | |
| | ORDER | |
| 14 | The parties having stipulated to change the deadline for filing motions related to discove | • |
| 15 | should be extended for 14 days, from July 13, 2018 to a new deadline of July 27, 2018, and go | od |
| 16 | cause appearing to grant the request, IT IS HEREBY ORDERED that the date for filing motion | ons |
| 17 | related to discovery is changed to <u>July 27, 2018</u> . | |
| 18 | DATED: July 16, 2018 | |
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| 21 | RICARDO S. MARTINEZ | |
| 22 | CHIEF UNITED STATES DISTRICT JUDGE | |
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